

Comment A

Revise as follows:

411.7 Exit marking. Exit signs shall be installed at the required exit or exit access doorways of amusement buildings. Approved directional exit markings shall also be provided. Where mirrors, mazes or other designs are utilized that disguise the path of egress travel such that they are not apparent, approved and listed low-level exit signs that comply with Section 1011.4, and directional path markings listed in accordance with UL 1994, shall be provided and located not more than 8 inches (203 mm) above the walking surface and on or near the path of egress travel. Such markings shall become visible in an emergency. The directional exit marking shall be activated by the automatic fire detection system and the automatic sprinkler system in accordance with Section 907.2.11.2.

Rationale:

Although the SFM does adopt UL 924 in Chapter 35, Section 411.7 does not make it clear that low-level exit signs are required to be listed.

UL 924 has specific electrical and performance test criteria for exit signs in general, and an additional test for impact damage for exit signs installed at floor– level.

Likewise, although the SFM does adopt UL 1994 in Chapter 35, Section 411.7 does not make it clear that path marking is required to be listed.

This clarification to the 2006 IBC was approved unanimously by the ICC Means of Egress Committee at the Orlando Code Hearings. (ICC G89)

Comment B

1. Revise as follows:

1011.4 Internally illuminated exit signs. Electrically powered ~~Internally illuminated, self-luminous and photoluminescent~~ exit signs shall be listed and labeled in accordance with UL 924 and shall be installed in accordance with the manufacturer's instructions and Section 2702. Exit signs shall be illuminated at all times the building space served by the means of egress is occupied.

2. Add new standard to Chapter 35 as follows:

Underwriters Laboratories (UL)

UL 924-06, Standard for Safety Emergency Lighting and Power Equipment

*51. UL 924- ~~06~~ ~~95~~ Emergency Lighting and Power Equipment, ~~Eighth~~ Ninth Edition, February 24, 2006
~~March 29, 1995 with revisions through and including July 11, 2004~~*

Rationale: This section of the code does not make it clear what standard internally illuminated exit signs are required to be listed to or what type of exit signs are considered internally illuminated. The SFM does adopt UL 924 in Chapter 35. This will add much needed clarification to the code.

Also, the ninth edition, dated February 24, 2006, should be referenced as the latest edition of that standard.

This clarification to the 2006 IBC was approved unanimously by the ICC Means of Egress Committee at the Orlando Code Hearings. (ICC E82 and E83)

Comment C

Revise as follows:

1011.6 Floor-level exit signs. Where exit signs are required by Chapter 10, additional approved floor-level exit signs listed and labeled in accordance with UL 924 and which are internally or externally illuminated, photoluminescent or self-luminous shall be provided in all interior corridors of Groups A, E, I, R-1, R-2 and R-4 Occupancies.

Exceptions:

1. Where path marking complying with Section 1011.7 is provided.
2. Group I-3 Occupancies.

The bottom of the sign shall not be less than 6 inches (152 mm) or more than 8 inches (203 mm) above the floor level and shall indicate the path of exit travel. For exit and exit-access doors, the sign shall be on the door or adjacent to the door with the closest edge of the sign or marker within 4 inches (102 mm) of the door frame.

Rationale: Although the SFM does adopt UL 924 in Chapter 35, Section 1011.6 does not make it clear that floor-level exit signs are also required to be listed. This is important because UL 924 requires an additional impact test if the exit sign is to be mounted at floor level. This will add much needed clarification to the code.

This clarification to the 2006 IBC was approved unanimously by the ICC Means of Egress Committee at the Orlando Code Hearings. (ICC E82 and E83)

Comment D

1. Revise as follows:

1011.7 Path marking. When exit signs are required by Chapter 10, approved path marking listed and labeled in accordance with UL 1994 shall be installed at floor level or no higher than 8 inches (203 mm) above the floor level in all interior corridors of Groups A, E, I, R-1, R-2 and R-4 Occupancies.

Such marking shall be continuous except as interrupted by door-ways, corridors or other such architectural features in order to provide a visible delineation along the path of travel and shall comply with Section 1011.5.3.

Exceptions:

1. Where floor level exit signs complying with Section 1011.6 are provided.
2. Group I-3 Occupancies.

Rationale: Although the SFM does adopt UL 1994 in Chapter 35, Section 1011.7 does not make it clear that path marking is required to be listed. This is important to insure that only path marking that has been tested to this standard is approved for use. This will add much needed clarification to the code.

This clarification to the 2006 IBC was approved unanimously by the ICC Means of Egress Committee at the Orlando Code Hearings. (ICC G89)

Comment E

Revise as follows:

1011.4 Internally illuminated exit signs. Internally illuminated exit signs shall be listed and labeled and shall be installed in accordance with the manufacturer's instructions and Section 2702. Exit signs shall be illuminated at all times the building space served by the means of egress is occupied.

Rationale:

California has some of the most stringent energy conservation laws and regulations in the nation. This is with good reason as our energy needs are greater than our energy resources. We must make sure that our code requirements do not waste electricity.

Section 1006.1 requires that the means of egress, including the exit discharge, shall be illuminated at all times the building space served by the means of egress is occupied. These two sections, 1006.1 and 1011.4 should always go hand-in-hand as one illuminates the means of egress and the other illuminates the exits. To have one on when the other is off is illogical and inconsistent.

It also wastes a lot of electricity to have exit signs on 24/7 even though the building is unoccupied and makes no sense at all for buildings that are closed for extended periods of time, such as for the winter. Most office buildings that work 8 to 6 five days a week are actually unoccupied more hours than they are occupied on an annual basis. Having electrical exit signs on 24/7 also makes the exit sign bulbs burn out sooner which makes maintenance a challenge in larger buildings.

The NFPA 101 Life Safety Code requires that the means of egress and exit signs be illuminated only when the building is occupied.

If there truly is a concern that people may come back to a building after normal work hours, and that the exit signs and means of egress may not be illuminated, motion detectors at the entrances to the building can be required to turn on those two systems.